

EXHIBIT D

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CHRISTOPHE STERCKX, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LUCKIN COFFEE INC., JENNY ZHIYA
QIUAN, REINOUT HENDRIK SCHAKEL,
CHARLES ZHENG YAO LU, JIAN LIU,
JINYI GUO, HUI LI, ERHAI LIU, CREDIT
SUISSE SECURITIES (USA) LLC, MORGAN
STANLEY & CO. LLC, CHINA
INTERNATIONAL CAPITAL
CORPORATION HONG KONG SECURITIES
LIMITED, HAITONG INTERNATIONAL
SECURITIES COMPANY LIMITED,
KEYBANC CAPITAL MARKETS INC., and
NEEDHAM & COMPANY, LLC,

Defendants.

Case No. 1:20-cv-01677

CLASS ACTION

**DECLARATION OF WEI ZUO IN SUPPORT OF HIS MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF HIS
SELECTION OF LEAD COUNSEL**

I, Wei Zuo, certify under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct:

1. I respectfully submit this Declaration in support of my motion for appointment as Lead Plaintiff in the above-captioned securities class action on behalf of investors in Luckin Coffee Inc. (“Luckin”), and for approval of my selection of Lead Counsel, pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). I am informed of and understand the requirements and duties imposed by the PSLRA. I have personal knowledge about the information in this Declaration.

2. I am a resident of Hangzhou, China, and suffered substantial losses as a result of my investment in the Luckin securities at issue in this case. My certification and loss chart attached to the Motion detail my transactions in Luckin securities.

3. I am a former executive at Alibaba Group Holding Ltd. and have experience with the operations of public companies, including companies that operate in China.

4. After learning of existing securities fraud class lawsuits involving Luckin, I contacted Block & Leviton LLP to discuss the lawsuit with them and obtain information about their law firm.

5. On April 3, 2020, I participated in a conference call to discuss moving for appointment as Lead Plaintiff and to select Block & Leviton LLP to be my counsel. I spoke with Jeffrey C. Block, Jacob A. Walker, and Stephen J. Teti from Block & Leviton LLP, and a translator to ensure accurate communication.

6. During the April 3, 2020 call, we discussed the lawsuit, as well as the role and responsibilities of a lead plaintiff and of lead counsel.

7. I learned of the experience, resources, and success of Block & Leviton, and am aware that Block & Leviton is an accomplished law firm with a history of obtaining significant recoveries in securities fraud class actions like this one. I believe that Block & Leviton's history of effectively litigating complex class action lawsuits provides me and the Class further comfort that Block & Leviton will vigorously prosecute this action in a cost-effective manner and in the best interests of the Class.

8. I believe that the Court should appoint me as Lead Plaintiff because I am a sophisticated investor with a significant interest in the outcome of the litigation and have the capability and competency to oversee this litigation to a successful conclusion.

9. I am capable of actively participating in this action and are committed to doing so, in part by working with my selected counsel to obtain the best possible recovery for the Class in an efficient manner. I have been in communication with the lawyers at Block & Leviton on a number of occasions since our initial call on April 3, 2020, and have no doubt about my ability to effectively communicate with them and fulfill my role as Lead Plaintiff. Given that I have lost over \$1 million on my Luckin securities transactions, I am highly motivated to seek the maximum recovery for me and for the Class.

10. Before deciding to seek appointment as Lead Plaintiff, I carefully considered the merits of this action and my losses. I discussed the merits of the case with the lawyers at Block & Leviton.

11. I understand that one of my primary responsibilities will be overseeing Lead Counsel to ensure that the litigation is handled efficiently, and that the resulting fees and expenses are fair and reasonable, relative to the size, complexity, and risk of the litigation.

12. I understand that I could have chosen to pursue an individual action, or taken no action and remained an absent class member. However, based on my financial losses and desire to actively oversee this litigation, I decided that it would be a benefit to me and the Class if I sought appointment as Lead Plaintiff.

13. I am committed to the zealous prosecution of this case and will remain actively involved in it, including through attendance at deposition and trial, if necessary. I understand that if appointed, I owe a fiduciary duty to all members of the putative class to provide fair and adequate representation and to work with Lead Counsel to obtain the largest possible recovery for the class consistent with good faith and vigorous advocacy.

14. I have knowledge of the requirements and responsibilities of lead plaintiffs in a securities class action. I will maintain regular contact with my attorneys to ensure the effective and vigorous prosecution of this case.

15. I understand that, as Lead Plaintiff in this action, I am subject to the jurisdiction of the Court and will be bound by all rulings of the Court, including rulings regarding any judgments.

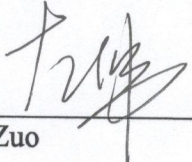
16. As Lead Plaintiff, I shall be responsible for overseeing the activities of my counsel for the duration of the litigation, who shall:

- a. Determine and present the position of Lead Plaintiff and the class on all matters that may arise during litigation of the action;
- b. Coordinate the initiation and conduct discovery on behalf of Lead Plaintiff and the class, including the preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
- c. Conduct settlement negotiations on behalf of Lead Plaintiff and the class;

- d. Negotiate and enter into those stipulations with opposing counsel necessary for the conduct of the litigation;
- e. Retain expert consultants and witnesses;
- f. Prepare and distribute periodic status reports to the Lead Plaintiff;
- g. Maintain adequate time and disbursement records covering services as Lead Counsel; and
- h. Perform such other duties as may be incidental to the proper and efficient coordination of the litigation or which may be authorized by further order of the Court.

Signed under penalty of perjury under the laws of the United States of America.

Executed this _11_ day of April, 2020.

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Wei Zuo